

REMARKS

This is intended as a full and complete response to the Office Action dated August 26, 2008, having a shortened statutory period for response set to expire on November 26, 2008. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-4, 6-7, 9-11, 14-16, and 28-30 are pending in the application. Claims 1-4, 6-7, 9-11, 14-16, and 28-30 remain pending following entry of this response. Claims 1, 6, 11, and 28 have been amended. Applicants submit that the amendments do not introduce new matter.

Further, Applicants do not concede that any pre-amended (or cancelled) claim is not patentable over the art cited by the Examiner, as the present claim amendments are only to facilitate an expeditious prosecution of the claimed subject matter. Applicants respectfully reserve the right to pursue any pre-amended claim (or other claims) in one or more continuations and/or divisional patent applications.

Claim Rejections - 35 U.S.C. § 103

Claims 1-4, 6-7, 9-11, 14-16, 28-30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Goiffon, et al.* (U.S. Patent No. 6,453,312) and in view of *Ryan, et al.* (U.S. Patent No. 6,421,675). Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a prima facie case of obviousness. See MPEP § 2141. Establishing a prima facie case of obviousness begins with first resolving the factual inquiries of *Graham v. John Deere Co.* 383 U.S. 1 (1966). The factual inquiries are as follows:

- (A) determining the scope and content of the prior art;
- (B) ascertaining the differences between the claimed invention and the prior art;
- (C) resolving the level of ordinary skill in the art; and
- (D) considering any objective indicia of nonobviousness.

Once the *Graham* factual inquiries are resolved, the Examiner must determine whether the claimed invention would have been obvious to one of ordinary skill in the art.

Respectfully, Applicants submit that the Examiner has not properly characterized the teachings of the references and/or the claims at issue. Accordingly, a prima facie case of obviousness has not been established.

Applicants submit that *Goiffon*, in view of *Ryan*, does not disclose a method recited by claim 1. Specifically, *Goiffon*, in view of *Ryan*, does not disclose a "method for context-sensitive searching of fields of a data repository using multiple levels of term expansion" that includes:

receiving, from a user, a relational database query containing a plurality of conditions, wherein at least one condition is a condition for searching at least one field of the data repository, wherein the at least one condition includes at least one base search term providing a keyword to search for in an unstructured text field of the relational database.

Claims 6, 11, and 28 recite a similar limitation.

Goiffon discloses a method for allowing a user to control the development of a concept-based natural language search query by controlling the manner in which a hierarchical concept tree is structured and traversed. *Goiffon*, 1:18-25. More simply, *Goiffon* discloses a system where users can expand a word-search with additional terms and concepts selected from a hierarchical display. For example, *Goiffon* discloses:

FIG. 4 is an exemplary screen provided by Search String Wizard (SSW) 121 to users to obtain the search string and other optional parameters required to initiate development of a search query. The user provides the initial search string in Box 400. In this example, assume the user provides the term "Bugs". The user further selects the levels of hierarchy within the hierarchical concept tree in one or more Application Domains that will be utilized to develop the search. This is accomplished by specifying whether parent, sibling, or child concepts will be included for any located concepts. These parameters are specified in Boxes 402, 404, and 406, respectively. If parent and/or child concepts are to be included, the number of levels of hierarchy to be traversed during the search development may be specified in Boxes 408 and 410. A default value of "one" is assumed if no value is provided.

Goiffon, 14:45-59. While *Goiffon* does disclose that terms included in a natural language search query may be expanded based on additional terms selected by a user from the three hierarchy (e.g., the "parent" child" or "sibling" concepts), *Goiffon* does not

disclose a discloses the use of relational database queries. That is, the tool used to build natural language search queries in *Goiffon* does not disclose a relational database query at all. Instead, the natural language search queries ultimately provide a set of keywords and related concepts supplied to a search engine.

For example, as disclosed in *Goiffon*, an "Application Domain" provides a "hierarchical concept tree stored in memory [used to] to develop a query. The nodes of the concept tree, which are grouped according to broad application areas called Application Domains, represent concepts that might describe any given search topic." *Goiffon*, 4:1-6. More simply, the "Application Domain" specifies a collection of related terms. For example, *Goiffon*, Figure 5 includes a list of word and word variants for the term "BUG" as including "BUGS" and "BUG'S" and also includes a list of concepts related to this term of "VW BEETLE," "INSECT," and "SOFTWARE PROBLEM." Similarly, *Goiffon*, Figure 7 shows an example of a user building a "search query" using a "word and word variants 502" and "concepts 504." A number of buttons allow users to add or remove words, to expand a concept (e.g., the concept of "Car" may be expanded to "Volkswagon," which itself may be expanded to "VW van" or "VW beetle."

Similarly, *Ryan* is directed to a "method of updating an internet search engine database with the results of a user's selection of specific web page listings from the general web page listing provided to the user as a result of his initial keyword search entry." *Ryan*, Abstract.

In contrast, claim 1 recites a step of "receiving, from a user, a relational database query." Further, claim 1 characterizes the "relational database query" as "containing a plurality of conditions, wherein at least one condition is a condition for searching at least one field of the data repository, wherein the at least one condition includes at least one base search term providing a keyword to search for in an unstructured text field of the relational database." Claims 6, 11, and 28 each recite similar limitations. Further, claim 1 recites that the relational database query may be modified to add additional conditions to the query used to search for terms in an unstructured text field of the relational database. As neither *Goiffon* nor *Ryan* disclose techniques related to processing a

relational database query, in general, or to a technique for context-sensitive term expansion used to modify a relational database query using a base search term in particular, Applicants submit that the combination of these references do not render obvious any of claims 1, 6, 11 or 28.

Accordingly, for all the foregoing reasons, Applicants submit that independent claims 1, 6, 11, and 28 are allowable and respectfully request allowance of the same. Additionally, claims 2-4, 7, 9-10, 14-16 and 29-30 each depend from one of claims 1, 6, 11, or 28. Accordingly, Applicants submit that these dependent claims are allowable and respectfully request allowance of the same.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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